

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

November 25, 2002

*IN RE: Complaint of AENEAS Communications)
Against Citizens Communications in Weakley)
County, Tennessee.)
)*

Docket No. 02-00438

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AENEAS FIRST ROUND OF DISCOVERY QUESTIONS

Pursuant to the Order of the Hearing Officer dated November 21, 2002 in the above captioned proceeding, Aeneas Communications hereby submits the following interrogatories to Citizens Communications:

Preliminary Matters and Definitions

When not otherwise specified the term "Citizens" refers to Citizens Communications and/or to any affiliated corporate entity, engaging in the offering of regulated telephone services in Tennessee.

With respect to each of the following interrogatories, in addition to supplying the information requested, please identify any and all documents that support, refer to, or evidence the subject matter of each interrogatory in your answers thereto. If any or all of the documents identified herein are no longer in your possession, custody or control because of destruction, loss, or other reason, then you are requested to identify each such document fully, including the nature and type of the document, its date, the identity of the person who prepared the document, and the identity of the person or entity for whom it was prepared, and to the extent possible, you are requested to summarize the contents of the document and state the manner and date of the disposition thereof. If any of the requested documents are objected to or not produced on the

basis of privilege, please include in your response to production, for each document, a written statement evidencing:

- a. The nature and type of the document;
- b. The date;
- c. The author of the document;
- d. The recipient;
- e. The sender; and
- f. A brief description of the contents sufficient to allow the TRA to rule on a motion to compel.

Consistent with the preceding definitions and preliminary matters, answer under oath the following interrogatories:

INTERROGATORIES

1. Describe how Citizens currently routes calls made by a Citizens subscriber in Weakley County to an Aeneas subscriber located in that same county.

ANSWER:

2. Has Citizens always routed such calls in the manner described in response to Question 1? If not, describe the manner in which Citizens formerly routed such calls, the date when Citizens changed the manner of routing those calls, and the reason for the change.

ANSWER:

3. If Citizens routed such calls as described above to a BellSouth tandem switch describe any applicable charges Citizen would have to pay for routing such calls in that manner.

ANSWER:

4. If Citizens, at any time in the past, routed such calls as described above to a BellSouth tandem, (a) provide the monthly number of minutes of such traffic for the most recent twelve month period and (b) provide the monthly charges, if any, paid by Citizens to BellSouth for routing such calls in that manner during the same period.

ANSWER:

5. In making decisions concerning the exchange of traffic among carriers, does Citizens adhere to the Local Exchange Routing Guide? Please explain what circumstances, if any, would cause Citizens to depart from the Local Exchange Routing Guide.

ANSWER:

Respectfully submitted,

By: 

Henry Walker

Boult, Cummings, Conners & Berry, PLC

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Counsel for Aeneas Communications

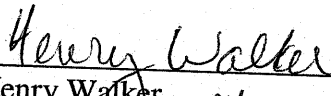
Dated this 25th day of November, 2002.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been forwarded via fax or hand delivery and U.S. mail to the following on this the 25th day of November, 2002.

Jim Wright, Esq.
United Telephone-Southeast, Inc.
14111 Capital Boulevard
Wake Forest, NC 27587

Aeneas Communications, LLC
Jonathan Harlan
301 South Church St.
Jackson, TN 38031


Henry Walker *nx*